

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



Phone: (803) 737-0800
Fax: (803) 737-0801

DAN F. ARNETT
CHIEF OF STAFF

December 7, 2004

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RECEIVED
2004 DEC - 7 PM 1:48
SC PUBLIC SERVICE
COMMISSION

Re: Follow-Up on the Commission's Regulations Workshop

Dear Mr. Terreni:

On November 29, 2004, the Office of Regulatory Staff (ORS) participated in the regulation workshop held by the Public Service Commission of South Carolina (Commission). ORS appreciates the opportunity to have been a part of the workshop and looks forward to working with the Commission and other interested parties in the development of the regulations.

While the notice of the workshop requested suggestions on changes to the regulations necessitated by the passage of 2004 S.C. Acts 175, one participant in the workshop presented suggested changes to the regulations outside the noticed scope of the workshop. All presenters stated recognition of the need for substantive changes to the regulations beyond the recommendations requested by the notice for this particular workshop. In addition, the Commission's coordinators of the workshop acknowledged that the Commission would consider enlarging the scope of proposed changes to the regulations to include substantive changes beyond the changes required by the passage of 2004 S.C. Acts 175.

While the ORS agrees with the other presenters from the workshop that substantive changes to the regulations will be required, the ORS would respectfully request that the Commission proceed with separate tracks for amendments to the regulations, with one track being the changes mandated by 2004 S.C. Acts 175 and the second track being changes to the substance of the regulations brought about by industry changes or industry dealings. The changes required by the passage of 2004 S.C. Acts 175 will direct parties how to deal with the Commission and the ORS after January 1, 2005. The importance of having in place regulations which will guide and aid parties in their contact and business with the Commission and with the ORS cannot be overstated. Thus, we at the ORS

Mr. Charles L.A. Terreni

December 7, 2004

Page 2

suggest that proceedings to make amendments to the regulations capturing the changes called for by the enactment of 2004 S.C. Acts 175 should proceed as quickly as possible. Further, as there will likely be much less disagreement on the changes required by 2004 S.C. Acts 175 than there will be on proposed substantive changes to the regulations, it is our hope that the amendments required by 2004 S.C. Acts 175 will proceed quickly and smoothly through the rulemaking process before the Commission and before the General Assembly.

We request that this letter be posted on the Commission's website with the other materials from the workshop. We do not have a list of all the persons or entities who attended the regulations workshop, and want all interested persons to be aware of this letter. The ORS commends the Commission on its attention to this matter, and we at the ORS are available to assist the Commission in any manner possible with this undertaking to amend the regulations. I thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan F. Arnett", with a stylized, flowing script.

Dan F. Arnett
Chief of Staff

cc: Jocelyn G. Boyd, Esquire